

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

ROSY GIRON DE REYES; JOSE  
DAGOBERTO REYES; FELIX ALEXIS  
BOLANOS; RUTH RIVAS; YOVANA  
JALDIN SOLIS; ESTEBAN RUBEN MOYA  
YRAPURA; ROSA ELENA AMAYA; and  
HERBERT DAVID SARAVIA CRUZ,

*Plaintiffs,*

vs.

WAPLES MOBILE HOME PARK LIMITED  
PARTNERSHIP; WAPLES PROJECT  
LIMITED PARTNERSHIP; and A.J.  
DWOSKIN & ASSOCIATES, INC.,

*Defendants.*

Civil Action No. 1:16cv00563-TSE-TCB

**PLAINTIFFS' OBJECTIONS TO DEFENDANTS' EXHIBITS**

Plaintiffs Rosy Giron de Reyes, Jose Dagoberto Reyes, Felix Alexis Bolaños, Ruth Rivas, Yovana Jaldin Solis, Esteban Ruben Moya Yrapura, Rosa Elena Amaya, and Herbert David Saravia Cruz ("Plaintiffs"), by counsel, respectfully submit the below Objections to Defendants' Exhibits in the above-captioned action, pursuant to Federal Rules of Civil Procedure 26, 32, and 33, the Federal Rules of Evidence, and the Court's July 28, 2016, December 7, 2016, September 25, 2020, and December 9, 2020 Orders (Dkt. Nos. 35, 125, 297, 316).

Plaintiffs' objections to the exhibits designated by Defendants are set forth in Appendix A. Plaintiffs expressly reserve all rights to amend, supplement, and/or modify their objections to Defendants' proposed exhibits, including, but not limited to, in response to: (i) a change in the trial structure, (ii) the Court's rulings on any pretrial motions pending or that may be filed, and (iii) any changes made by Defendants to their proposed trial exhibit list, deposition designations,

and/or witness list.

Plaintiffs reserve the right to seek limiting instructions regarding any of Defendants' proposed trial exhibits that the Court may ultimately deem admissible.

Plaintiffs reserve the right to offer evidence in response to Defendants' trial exhibits or to any exhibit that is admitted over Plaintiffs' objections, including: (i) the right to designate additional trial exhibits for impeachment or cross-examination purposes, including any additional exhibits not currently listed on Plaintiffs' Exhibit List, and (ii) the right to rebut or to place in proper context exhibits designated by Defendants at trial.

Plaintiffs reserve the right to object to the admission of any of Defendants' proposed exhibits for which no witness testifies at trial.

Plaintiffs object generally as to authenticity, and reserve the right to assert an authentication objection to any exhibit offered by Defendants at trial.

Respectfully submitted,

//s//

December 23, 2020

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**Certificate of Service**

I hereby certify that on December 23, 2020, I caused the foregoing to be filed electronically with the Clerk of the Court using CM/ECF, which will then send a notification of such filing to all counsel of record.

\_\_\_\_\_/s/\_\_\_\_\_  
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Dated: December 23, 2020